

GOBIERNO DE PUERTO RICO
JUNTA REGLAMENTADORA DE TELECOMUNICACIONES DE PUERTO RICO

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November 27, 2000

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Magalie R. Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Federal Communications Commission
Office of Secretary

Irene Flannery
Vice President
High Cost Division
Universal Service Administrative Company
80 South Jefferson Road
Whippany, NJ 07981

Re: CC Docket 96-45 Amended Certification of the
Telecommunications Regulatory Board of Puerto Rico

Dear Ms. Salas and Ms. Flannery:

The Telecommunications Regulatory Board of Puerto Rico ("Board") hereby amends its certification with the FCC filed on September 26, 2000 in the matter of state certification of federal universal service hold-harmless support. In its initial certification the Board certified that all but \$3 million (2.3 percent) of federal universal service support is used in the wire centers of Puerto Rico Telephone Company's ("PRTC's") combined study areas for the provision, maintenance, and upgrading of facilities and services. As noted in the initial certification, the Board's analysis suggested that the reason why 100 percent of the federal hold harmless support could not be certified was due to a modeling anomaly that overstated the line counts in four wire PRTC centers. The use of model lines had the effect of allocating a disproportionate amount of federal support to these four wire centers causing the Board's certification assessment to approve only 97.7 percent of PRTC federal hold harmless support.

On July 24, 2000, the FCC issued a Public Notice (DA 001626) addressing the use of actual or reported lines in lieu of the proxy model lines to determine universal service cost. The Board believes that adoption of this suggestion would eliminate the observed modeling anomaly. Indeed, the Board has examined the results of the synthesis model using reported lines in the manner prescribed by the Public Notice. These results show that 100 percent of federal hold-harmless support is used for universal service.

The Board therefore seeks leave to amend its initial certification and now certifies that all federal high-cost hold-harmless support received by eligible telecommunications

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Honorable Magalie R. Salas
Ms. Irene Flannery
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carriers in Puerto Rico is used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

Respectfully submitted,



Phoebe Forsythe Isales
Chair 

CERTIFICATE OF SERVICE

I, Susanne Gyldenvand Martin, hereby certify that on this 27th day of November 2000, copies of the foregoing "Amended Certification Letter of the Telecommunications Regulatory Board of Puerto Rico," of same date, was served via first-class U.S. mail, postage prepaid, to the following:

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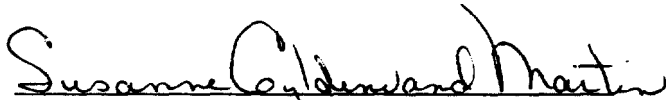
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